

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**RECOVERY LIMITED PARTNERSHIP,
Plaintiff,**

v.

Civil Action No.: 2:87-cv-00363

**UNIDENTIFIED, WRECKED AND ABANDONED
SAILING VESSEL, etc.,
Defendant.**

STATUS REPORT TO COURT

Recovery Limited Partnership (the “Plaintiff” or “RLP”), by counsel, respectfully submits this Report to the Court as salvor-in-possession of the wreck of the S.S. CENTRAL AMERICA. Plaintiff has previously submitted twenty-eight reports, two in Civil Action No. 2:14-cv-160, and twenty-six in Civil Action No. 2:87-cv-363. *See* ECF # 21 and 90 (No. 2:14-cv-160); ECF # 104, 130, 163, 175, 176, 177, 195, 202, 209, 233, 256, 264, 267, 273, 278, 280, 281, 289, 290, 291, 292, 293, 294, 295, 303, and 304 (No. 2:87-cv-363).

As reported in December 2023 (ECF # 304), the Trustee, John Pidcock, together with RLP’s salvage adviser, Craig T. Mullen, completed their evaluation of potential salvors for salvage of the wreck of the S.S. CENTRAL AMERICA in 2024. Based on a various factors, Eclipse Group, Inc. (“Eclipse”) was selected as the preferred salvor. After reviewing the salvage plan, the Court approved RLP’s 2024 salvage operations by letter dated March 15, 2024. ECF # 321.

Subsequently, Eclipse notified Mr. Mullen and the Trustee that the vessel identified for the operation was no longer available during the planned salvage window. Additionally, despite efforts, an alternative vessel with comparable technical capabilities was unable to be secured, causing disruption to salvage planning and procurement activities from March to April of 2024.

Given these developments, the Trustee has ceased its association with Eclipse and is presently arranging salvage operations for 2025 with a different salvor.

The Trustee, together with Mr. Mullen, is evaluating several potential salvors, along with their equipment and vessel availability, for the salvage of the wreck in 2025. Depending on salvor selection and vessel availability, salvage operations could commence as soon as May 2025.

The Trustee expects to complete selection of the salvor by November 15, 2024. The Trustee will then submit a proposed salvage plan and recommendation for approval under seal for the Court to review and determine whether to approve it before finalizing contractual arrangements with the salvor. In order to assure vessel and equipment availability, the Trustee anticipates submitting the recommendation and request for approval to the Court by December 15, 2024. Notably, any salvage plan for 2025 will closely align with the operations previously authorized by the Court. ECF # 321.

The Trustee is aware that exclusive jurisdiction over the salvage of the wreck of the S.S. CENTRAL AMERICA lies with this Court. He understands his obligation to notify this Court regarding any future salvage and will seek advance approval before any such salvage is performed in accordance with the Order entered January 11, 2019. ECF # 276.

The Trustee and counsel are available to address any questions that the Court may have regarding this report.

This 8th day of May, 2024.

/s/ James L. Chapman, IV
James L. Chapman, IV, Esquire (VS. No. 21983)
K. Barrett Luxhoj, Esquire (VS. No. 86302)
Counsel for Recovery Limited Partnership
CRENSHAW, WARE & MARTIN, PLC.
150 West Main Street, Suite 1923
Norfolk, Virginia 23510
Telephone: (757) 623-3000

Facsimile: (757) 623-5735
jchapman@cwm-law.com
kbluxhoj@cwm-law.com

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of May, 2024, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV
James L. Chapman, IV, Esquire (VS. No. 21983)
K. Barrett Luxhoj, Esquire (VS. No. 86302)
Counsel for Recovery Limited Partnership
CRENSHAW, WARE & MARTIN, PLC.
150 West Main Street, Suite 1923
Norfolk, Virginia 23510
Telephone: (757) 623-3000
Facsimile: (757) 623-5735
jchapman@cwm-law.com
kbluxhoj@cwm-law.com